

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

IN RE WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

Master Case No. C09-037 MJP

[Consolidated with: Case Nos. CV09-0134 MJP, CV09-0137 MJP, and CV09-01557 MJP]

**[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION TO COMPEL
DOCUMENTS FROM BOILERMAKERS
NATIONAL ANNUITY TRUST**

THIS MATTER came before the Court on Defendants' Motion to Compel Documents from Boilermakers National Annuity Trust ("Boilermakers") (filed July 26, 2011). After having considered the moving papers, and all other documents and evidence on record submitted in support of the Motion, and having been fully advised in these matters, and good cause appearing, the Court orders as follows:

Defendants' Motion is GRANTED. Plaintiffs are hereby ordered to make a supplemental production of the following documents, and a privilege log, if necessary, no later than 1 month after this Order is entered by the Court:

(1) all documents, including e-mails and electronically-stored information ("ESI"), in

1 Boilermakers' custody and control, from its investment advisors regarding residential
2 mortgage-backed securities, including all communications and reports;

3 (2) all documents, including e-mails and ESI, in Boilermakers' custody and control
4 responsive to Defendants' Request for Production Nos. 9, 10, 30;

5 (3) all documents, including e-mails and ESI, in Boilermakers' custody and control
6 responsive to Defendants' Request for Production Nos. 13 and 14;

7 (4) all documents, including e-mails and ESI, in Boilermakers' custody and control
8 responsive to Defendants' Request for Production Nos. 4, 8, 39 and 43;

9 (5) all documents, including e-mails and ESI, in Boilermakers' custody and control
10 responsive to Defendants' Request for Production No. 19.

11 DATED this _____ day of August, 2011.

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13 HONORABLE MARSHA J. PECHMAN

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15 Presented By:

16 HILLIS CLARK MARTIN & PETERSON P.S.

17 By s/ Brian C. Free

18 Louis D. Peterson, WSBA #5776

19 Brian C. Free, WSBA #35788

20 Hillis Clark Martin & Peterson P.S.

21 1221 Second Avenue, Suite 500

22 Seattle WA 98101-2925

23 Telephone: (206) 623-1745

24 Facsimile: (206) 623-7789

25 Email: ldp@hcmp.com; bcf@hcmp.com

1 Stellman Keehnel -stellman.keehnel@dlapiper.com,patsy.howson@dlapiper.com
2 Paul Joseph Kundtz -
3 pkundtz@riddellwilliams.com,mdowns@riddellwilliams.com,mbergquam@ri
ddellwilliams.com
4 Joel P Laitman -jlaitman@cohenmilstein.com
5 Bruce Earl Larson -blarson@karrtuttle.com,psteinfeld@karrtuttle.com
6 Mike Liles , Jr-mliles@karrtuttle.com
7 Christopher E Lometti -clometti@cohenmilstein.com
8 John D Lowery -jlowery@riddellwilliams.com,dhammonds@riddellwilliams.com
9 Douglas C McDermott -doug@mcdermottnewman.com,eric@mcdermottnewman.com
10 Bradley T. Meissner -bradley.meissner@dlapiper.com
11 Timothy Michael Moran -
12 moran@kiplinglawgroup.com,cannon@kiplinglawgroup.com
13 Walter W. Noss - wnoss@scott-scott.com,efile@scott-scott.com
14 Brian O. O'Mara -bomara@csgr.com
15 Barry Robert Ostrager -bostrager@stblaw.com,managingclerk@stblaw.com
16 Kenneth J Pfaehler -kenneth.pfaehler@snrdenton.com,nicole.reeber@snrdenton.com
17 Daniel B Rehns -drehns@cohenmilstein.com,efilings@cohenmilstein.com
18 Kenneth M Rehns -krehns@cohenmilstein.com
19 Julie Goldsmith Reiser -jreiser@cohenmilstein.com
20 Serena Richardson -srichardson@labaton.com,ElectronicCaseFiling@labaton.com
21 Rogelio Omar Riojas -
22 omar.riojas@dlapiper.com,nina.marie@dlapiper.com,karen.hansen@dlapiper.com
23 Darren J Robbins -e_file_sd@csgr.com
24 Tammy Roy -troy@cahill.com
25 Joshua M. Rubins -jrubins@ssbb.com,managingclerk@ssbb.com,jregan@ssbb.com
26 Stephen M. Rummage -steverummage@dwt.com,jeannecadley@dwt.com
27 Hollis Lee Salzman -hsalzman@labaton.com,ElectronicCaseFiling@labaton.com
28 Paul Scarlato -pscarlato@labaton.com,ElectronicCaseFiling@labaton.com
Arthur L Shingler -ashingler@scott-scott.com,efile@scott-scott.com
Gavin Williams Skok -gskok@riddellwilliams.com,dhammonds@riddellwilliams.com
Richard A Speirs -rspeirs@cohenmilstein.com
Kim D Stephens -
kstephens@tousley.com,wcruz@tousley.com,cbonifaci@tousley.com
Robert D Stewart -stewart@kiplinglawgroup.com,cannon@kiplinglawgroup.com
Janissa Ann Strabuk -jstrabuk@tousley.com,wcruz@tousley.com

[Proposed] Order Granting Defendants' Motion to
Compel Documents from Boilermakers National Annuity
Trust: (CV09-037 MJP) - 4

HILLIS CLARK MARTIN & PETERSON P.S.
1221 Second Avenue, Suite 500
Seattle, Washington 98101-2925
Telephone: (206) 623-1745
Facsimile: (206) 623-7789

1 Steven J Toll -stoll@cohenmilstein.com,efilings@cohenmilstein.com
2 Mary Kay - Vyskocil mvyskocil@stblaw.com
3 Dennis H Walters -dwalters@karrtuttle.com,wbarker@karrtuttle.com
4 Adam Zurofsky -azurofsky@cahill.com

5 DATED this 26th day of July, 2011, at Seattle, Washington.
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7 By s/ Brian C. Free
8

9 Brian C. Free, WSBA #35788
10 1221 Second Avenue, Suite 500
11 Seattle WA 98101-2925
12 Telephone: (206) 623-1745
13 Facsimile: (206) 623-7789
14 Email: bcf@hcmp.com
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HILLIS CLARK MARTIN & PETERSON P.S.
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